



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100
Boston, MA 02109-3912

March 15, 2013

Ellen Pierce
Bureau of Air Management
Department of Energy & Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Dear Ms. Pierce:

Thank you for your timely submittal of your 2010-2011 Biennial Evaluation of Connecticut's Motor Vehicle Inspection/Maintenance (I/M) Program, which also includes the information required for the 2011 Annual Motor Vehicle I/M Program report. EPA appreciates the effort you put into providing us with this important information.

As you know, such reporting is required under EPA's I/M rule. We believe it is important for States to be collecting this information, and determining whether or not the vehicle inspection program is working as effectively and efficiently as possible. EPA also believes that this information provides useful insight into how well the program is working relative to our policies and regulations and in the context of your State Implementation Plan (SIP).

The report is very well organized and responds to the regulatory mandate. We also acknowledge your thorough responsiveness to the comments we provided on previous annual and biennial reports. The Enclosure to this letter includes a few comments that EPA feels will enhance Connecticut's I/M program reporting and will assist EPA in our continued effort to monitor the evolution of I/M programs.

If you or your staff have any questions on these comments, please contact Ariel Garcia at 617-918-1660.

Sincerely,

A handwritten signature in cursive script that reads "Anne E. Arnold".

Anne E. Arnold, Manager
Air Quality Planning Unit

Enclosure

cc: Eyvonne Parker-Bair, CT DMV

Enclosure

**EPA's Comments on Connecticut's 2010-2011 Biennial Evaluation Report
for the Motor Vehicle Inspection/Maintenance Program**

- 1) EPA appreciates Connecticut's inclusion of OBD Initial Test, First Retest, and Second and Later Retest results of diesel-powered vehicles. This information will be helpful in EPA's continued discussions of the evolution of motor vehicle inspection and maintenance programs.
- 2) EPA encourages states/areas to improve I/M program performance by reducing the number of vehicles with no known final outcome.

Connecticut now incorporates a calculation of the percentage of vehicles with no known final outcome based on vehicles that initially failed and do not receive a final pass. On page 18 of the annual report's Appendix B, Connecticut illustrates that about 22.1% of initially failed vehicles have no known final outcome.

EPA continues to be concerned with I/M programs where the percentage of initially failed vehicles with no known final outcome exceeds the national average of approximately 12%.

EPA recommends that states with I/M programs consider developing a Vehicle Identification Number (VIN)-based database for vehicles that fail an I/M test and do not receive a final pass. This data may possibly already be collected and would just need to be filtered from the inspection database when the time comes. Ultimately, potential reciprocity agreements allowing the sharing of such data among and between I/M programs will address a number of issues and greatly improve I/M programs.